

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

IN RE: Jonathon Dale Fairley, Debtor

**Case No. 23-51697-KMS
CHAPTER 13**

NOTICE

The above referenced debtor has filed papers with the court to allow payment arrearage. **Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)**

If you do not want the court to amortize the payments, or if you want the court to consider your views on the Motion, then on or before 30 days, you or your attorney must:

File with the court a written request for a hearing at:

U.S. Bankruptcy Clerk
U.S. Bankruptcy Court
Dan M. Russell, Jr. United States Courthouse
2012 15th St., Ste. 244
Gulfport, MS 39501

If you mail your request to the court for filing, you must mail it early enough so the court will **receive** it on or before the date state above.

You must also mail a copy to the debtors' attorney:

The Rollins Law Firm, PLLC
P.O. Box 13767
Jackson, MS 39236
(601) 500-5533

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief, which shall sustain this Motion to Allow Payment Arrearage.

Date: June 26, 2025

Signature: /s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr. (MSBN 103469)
Jennifer Ann Curry Calvillo (MSBN 104367)
The Rollins Law Firm, PLLC
P.O Box 13767
Jackson, MS 39236

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

IN RE: Jonathon Dale Fairley, Debtor

**Case No. 23-51697-KMS
CHAPTER 13**

MOTION TO ALLOW PAYMENT ARREARAGE

COMES NOW, Debtor, by and through counsel, and moves this Court to amortize their past due Chapter 13 plan payments, and in support thereof, would show the Court as follows:

1. Debtor filed a voluntary petition for relief under Chapter 13 of the Bankruptcy Code.
2. Debtor fell behind on his payments.
3. Debtor is requesting this Honorable Court to amortize the past due plan payments over the life of the plan, including any ongoing mortgage payments being paid through the plan.
4. Debtor is requesting that their Chapter 13 plan payments be increased as necessary to compensate for the lost plan payments with ongoing payments to resume in July 2025.

WHEREFORE, Debtor prays for an Order granting the above requested relief and any additional relief as may be just and proper.

Respectfully submitted

/s/ Thomas C. Rollins, Jr.

Thomas C. Rollins, Jr. (MS Bar No. 103469)

Jennifer Ann Curry Calvillo (MS Bar No. 104367)

The Rollins Law Firm, PLLC

P.O. Box 13767

Jackson, MS 39236

601-500-5533

CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., certify that an accurate copy of the Notice and Motion to Allow Payment Arrearage was filed on CM/ECF this day and that the Chapter 13 Case Trustee and U.S. Trustee are registered to receive electronic notice in this case. The date of said notice is reflected on the Docket.

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE:

JONATHON DALE FAIRLEY

CASE NO: 23-51697-KMS

**DECLARATION OF MAILING
CERTIFICATE OF SERVICE**

Chapter: 13

On 6/26/2025, I did cause a copy of the following documents, described below,
Notice and Motion to Allow Payment Arrearage

to be served for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

I caused these documents to be served by utilizing the services of BK Attorney Services, LLC d/b/a certificateofservice.com, an Approved Bankruptcy Notice Provider authorized by the United States Courts Administrative Office, pursuant to Fed.R.Bankr.P. 9001(9) and 2002(g)(4). A copy of the declaration of service is attached hereto and incorporated as if fully set forth herein.

Parties who are participants in the Courts Electronic Noticing System ("NEF"), if any, were denoted as having been served electronically with the documents described herein per the ECF/PACER system.

DATED: 6/26/2025

/s/ Thomas C. Rollins, Jr.

Thomas C. Rollins, Jr.

Attorney at Law

The Rollins Law Firm

702 W. Pine Street

Hattiesburg, MS 39401

601 500 5533

trollins@therollinsfirm.com

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE:

JONATHON DALE FAIRLEY

CASE NO: 23-51697-KMS

**CERTIFICATE OF SERVICE
DECLARATION OF MAILING**

Chapter: 13

On 6/26/2025, a copy of the following documents, described below,

Notice and Motion to Allow Payment Arrearage

were deposited for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

The undersigned does hereby declare under penalty of perjury of the laws of the United States that I have served the above referenced document(s) on the mailing list attached hereto in the manner shown and prepared the Declaration of Certificate of Service and that it is true and correct to the best of my knowledge, information, and belief.

DATED: 6/26/2025



Miles Wood
BK Attorney Services, LLC
d/b/a certificateofservice.com, for
Thomas C. Rollins, Jr.
The Rollins Law Firm
702 W. Pine Street
Hattiesburg, MS 39401

USPS FIRST CLASS MAILING RECIPIENTS:

Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

CASE INFO

LABEL MATRIX FOR LOCAL NOTICING
NCRS ADDRESS DOWNLOAD
CASE 23-51697-KMS
SOUTHERN DISTRICT OF MISSISSIPPI
THU JUN 26 11-17-52 PST 2025

ALLY CAPITAL CO AIS PORTFOLIO SERVICES
LLC
4515 N SANTA FE AVE DEPT APS
OKLAHOMA CITY OK 73118-7901

ALLY CAPITAL CO AIS PORTFOLIO SERVICE
LL
4515 N SANTA FE AVE DEPT APS
OKLAHOMA CITY OK 73118-7901

EXETER FINANCE LLC CO AIS PORTFOLIO
SERVIC
4515 N SANTA FE AVE DEPT APS
OKLAHOMA CITY OK 73118-7901

PRA RECEIVABLES MANAGEMENT LLC
POB 41067
NORFOLK VA 23541-1067

SYNCHRONY BANK CO AIS PORTFOLIO
SERVICES LL
4515 N SANTA FE AVE DEPT APS
OKLAHOMA CITY OK 73118-7901

VANDERBILT MORTGAGE AND FINANCE INC
PO BOX 9800
MARYVILLE TN 37802-9800

~~EXCLUDE~~

~~US BANKRUPTCY COURT
DAN M RUSSELL JR US COURTHOUSE
2012 15TH STREET SUITE 244
GULFPORT MS 39501 2036~~

AFFIRM INC
ATTN BANKRUPTCY
650 CALIFORNIA ST
FL 12
SAN FRANCISCO CA 94108-2716

AFFIRM INC
RESURGENT CAPITAL SERVICES
PO BOX 10587
GREENVILLE SC 29603-0587

~~EXCLUDE~~

~~(D)ALLY CAPITAL CO AIS PORTFOLIO
SERVICES LLC
4515 N SANTA FE AVE DEPT APS
OKLAHOMA CITY OK 73118 7901~~

ALLY FINANCIAL INC
ATTN BANKRUPTCY
500 WOODARD AVE
DETROIT MI 48226-3416

AMERICOR
18200 VON HARMAN AVE
6TH FLOOR
IRVINE CA 92612-1023

CFNA
ATTN BANKRUPTCY
PO BOX 81315
CLEVELAND OH 44181-0315

(P)DEERE CREDIT SERVICES INC
ATTN LITIGATION RECOVERY DEPARTMENT
PO BOX 6600
JOHNSTON IA 50131-6600

EXETER FINANCE LLC
ATTN BANKRUPTCY
PO BOX 166008
IRVING TX 75016-6008

EXETER FINANCE LLC
CO AIS PORTFOLIO SERVICES LLC
4515 N SANTA FE AVE DEPT APS
OKLAHOMA CITY OK 73118-7901

FIRST HERITAGE CREDIT
605 CRESCENT BLVD
STE 101
RIDGELAND MS 39157-8659

FIRST HERITAGE OF MISSISSIPPI LLC CO
HEIGH
PO BOX 1947
GREENVILLE SC 29602-1947

(P)JEFFERSON CAPITAL SYSTEMS LLC
PO BOX 7999
SAINT CLOUD MN 56302-7999

JOHN DEERE FINANCIAL
PO BOX 650215
DALLAS TX 75265-0215

(P)KLARNA INC
ATTN BANKRUPTCY
PO BOX 8116
COLUMBUS OH 43201-0116

LVNV FUNDING LLC
CO RESURGENT CAPITAL SERVICES
PO BOX 10587
GREENVILLE SC 29603-0587

ONE MAIN FINANCIAL
ATTN BANKRUPTCY
PO BOX 3251
EVANSVILLE IN 47731-3251

ONEMAIN FINANCIAL
PO BOX 3251
EVANSVILLE IN 47731-3251

(P)PORTFOLIO RECOVERY ASSOCIATES LLC
PO BOX 41067
NORFOLK VA 23541-1067

PRA RECEIVABLES MANAGEMENT LLC AS
AGENT OF
PORTFOLIO RECOVERY ASSOCIATES LLC
PO BOX 41067
NORFOLK VA 23541-1067

USPS FIRST CLASS MAILING RECIPIENTS:

Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

PAYTOMRW
9920 KINCEY AVENUE
HUNTERSVILLE NC 28078-2400

PRIORITY ONE BANK
215 MAIN ST
COLLINS MS 39428-6184

(P)REPUBLIC FINANCE LLC
282 TOWER RD
PONCHATOULA LA 70454-8318

~~EXCLUDE~~

~~(D) (P) REPUBLIC FINANCE LLC
282 TOWER RD
PONCHATOULA LA 70454-8318~~

ROBIN FAIRLEY
621 SHIRLEY STANDFORD RD
SEMINARY MS 39479-8900

ROBIN FAIRLEY
621 SHIRLEY STANFORD R
SEMINARY MS 39479-8900

SANTANDER CONSUMER USA
1601 ELM ST SUITE 800
DALLAS TX 75201-7260

SANTANDER CONSUMER
ATTN BANKRUPTCY
PO BOX 961245
FORT WORTH TX 76161-0244

SYNCHRONY
ATTN BANKRUPTCY
PO BOX 955060
ORLANDO FL 32896-5060

~~EXCLUDE~~

SYNCHRONY BANK
CO AIS PORTFOLIO SERVICES LLC
4515 N SANTA FE AVE DEPT APS
OKLAHOMA CITY OK 73118-7901

~~UNITED STATES TRUSTEE
501 EAST COURT STREET
SUITE C 430
JACKSON MS 39201-5022~~

VANDERBILT MORTGAGE
ATTN BANKRUPTCY
PO BOX 9800
MARYVILLE TN 37802-9800

~~EXCLUDE~~

~~(D) VANDERBILT MORTGAGE AND FINANCE INC
PO BOX 9800
MARYVILLE TN 37802-9800~~

~~EXCLUDE~~

~~(P) DAVID RAWLINGS
ATTN DAVID RAWLINGS CHAPTER 13 TRUSTEE
PO BOX 566
HATTIESBURG MS 39403-0566~~

JENNIFER A CURRY CALVILLO
THE ROLLINS LAW FIRM
702 W PINE ST
HATTIESBURG MS 39401-3836

DEBTOR

JONATHON DALE FAIRLEY
24 SOUTH CLEMENT ST
DEXTER MO 63841-2204

~~EXCLUDE~~

~~THOMAS CARL ROLLINS JR
THE ROLLINS LAW FIRM PLLC
PO BOX 13767
JACKSON MS 39236-3767~~